

HEARTLAND

CONSUMERS POWER DISTRICT

October 19, 2006

Ms. Rose Hargrave
Policy Director
CENWD-PDM
12565 West Center Road
Omaha, NE 68144-3869

Dear Ms. Hargrave:

Heartland Consumers Power District offers the following comments on the draft "Proposed Framework for Establishing the Missouri River Recovery Implementation Committee". Heartland is a public power district based in Madison, South Dakota. We provide wholesale power and energy to public power systems and state agencies in South Dakota, Minnesota, and Iowa. Many of these organizations hold hydropower allocations from the Missouri Basin Pick Sloan Project. These allocations are managed by Heartland.

Heartland and its Customers have a vital interest in decisions impacting the management and operation of the Missouri River. Federal power customers contribute significant financial support for these operations through rates paid for hydropower produced at the six mainstem dams.

We have two major areas of concern with the draft document:

First, the process just to develop the Missouri River Recovery Implementation Committee (MRRIC) is projected to last nine months, beginning in January 2007. This is too long. In addition, the process seems to duplicate what the Corps' Plenary Group did last year. The "Proposed Framework" outlines suggested representation and selection for members of the Planning Committee, but is silent concerning representation and selection of members to the actual MRRIC.

Summarizing our process concerns:

- Too much time is allotted to developing a charter for MRRIC;
- The “Proposed Framework” offers no guidance on representation in MRRIC; and
- The Planning Committee should be eliminated, with the Federal agencies setting the responsibilities of MRRIC, limited to recovery of threatened and endangered species.

The composition and selection of the Planning Committee, or MRRIC, is flawed. Not all authorized project purposes of Pick-Sloan are given representation. Other interests are either over-represented, when compared to representation of others, or are duplicative of other groups, thus unbalancing the committee. Representatives from non-governmental organizations would be selected by the Federal Working Group, a formula for the group to take on the appearance of a “rubber stamp”. Non-governmental members should be selected by the Secretary of the Interior.

Summary of our concerns on proposed committee representation and selection:

- Authorized Pick-Sloan project purposes should have representation on MRRIC;
- Power interests should have four seats at MRRIC;
- Concerns of thermal plant operators could be included in Municipal and Industrial Water (a Pick-Sloan project purpose currently omitted);
- The Federal Working Group should not select committee members, since the FWG does not have the expertise for making such judgments, and selection by the FWG gives the committee the appearance of a “rubber stamp;” and
- Inclusion of some stakeholders as a separate category (e.g. community-based river organizations) appears to duplicate interests that would be represented under recreation, environment, and conservation, thus providing committee representation with one area of interest with far more members than others.

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Heartland understands the complex and difficult task facing the Corps. We appreciate the opportunity to provide input into the process and working with interested organizations in developing an adaptive management plan for the Missouri River that meets the needs of threatened and endangered species while recognizing the economic needs of the region.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike McDowell", with a stylized flourish at the end.

Mike McDowell
General Manager and CEO

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